

# Exhibit 3

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ANDRE BISASOR,  
Plaintiff,

v.

CRAIG S. DONAIS;  
RUSSELL F. HILLIARD;  
DONAIS LAW OFFICES, PLLC;  
UPTON & HATFIELD, LLP;  
and MARY K. DONAIS,  
Defendants.

Case No. 1:23-CV-11313

**[EMERGENCY] MOTION TO STAY CASE DUE TO PENDENCY OF ANOTHER  
RELATED PROCEEDING AND APPEAL IN STATE COURT**

NOW COMES the Plaintiff Andre Bisasor (hereinafter "plaintiff"), and respectfully request that the court enters a stay on this proceeding due to pendency of another related proceeding and an appeal in state court, (which existed prior to the case being removed to this court). In support of this motion, plaintiff states the following:

1. This case was removed from superior court yesterday.
2. I was blindsided by the snap removal to federal court by the defendants.
3. There is another proceeding related to this case that was pending prior to removal.
4. There is also an appeal pending on related proceeding, in the state appeals court that was pending prior to removal.
5. The related matters are closely tied to the issues of this case. There are important rights that must be resolved before this case can proceed. For example, there might be the need to consolidate cases into this court or otherwise I should be allowed an opportunity to have the state court matters proceed, in lieu of this proceeding in this court.
6. I believe the intention of this removal is to frustrate and prejudice these proceedings in state court.
7. I also intend to move to remand this case.
8. NB: The case was just removed yesterday. No motions have been filed by the defendants in this case whether in superior court or in this court. No answer has been filed by the defendants whether in superior court or in this court. No discovery has occurred whether in superior court or in this court. All defendants have not yet been served process. I have not yet been allowed to do e-filing as a pro se litigant in this court.
9. However, I also have pending motions that were not ruled on in superior court prior to removal to this court including a motion to enter default against defendants Craig Donais and Russell Hilliard.

10. A stay on this case would allow for those related matters in state court to be resolved so that this court does not issue orders that are in conflict with those matters.
11. I ask that this motion be resolved before any dispositive motion or act is resolved by the court.
12. I hereby preserve all rights waiving no rights whatsoever.
13. This is being filed as an emergency because I could be significantly prejudiced without allowance of an amendment to the complaint.
14. I have sought to confer with the defendants' counsel but due to unreasonable time constraints presented to me today by defendants' counsel regarding my request for an opportunity to confer on certain matters today, I was not able to obtain conference prior to filing.
15. I also request a hearing on this motion if possible as soon as possible.
16. Please grant a pro se liberal construction to this pleading.
17. Please grant the relief requested.

Respectfully submitted,

/s/ Andre Bisasor

Andre Bisasor

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June 13, 2023

#### **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was served to the defendants or their counsel in this case.

/s/ Andre Bisasor

Andre Bisasor

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